

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Jefferson Yachts Inc  
700 E. Market Street  
Jeffersonville, Indiana 47130**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F019-12625-00105	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 22, 2003  Expiration Date: April 22, 2008

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary fiberglass boat manufacturing company.

Authorized individual:	President
Source Address:	700 E. Market Street, Jeffersonville, Indiana 47130
Mailing Address:	700 E. Market Street, Jeffersonville, Indiana 47130
General Source Phone:	(812) 282-8111
SIC Code:	3732
Source Location Status:	Clark
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

### A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

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This fiberglass boat manufacturing company consists of two (2) plants:

- (a) Plant 1, 019-00105, is located at 700 E. Market Street, Jeffersonville, IN;
- (b) Plant 2, 019-00105, is located at America Place, Building 252, Jeffersonville, IN.

Since the two (2) plants are located on adjacent properties (separated by one and a half (1.5) miles), belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this FESOP.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) 1808/Gelcoat Spray Gun (HVLV), identified as emission unit No. 1, Constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (b) One (1) 0371/FloCoater Gun, identified as emission unit No. 2, Constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.
- (c) One (1) 0637/FloCoater Gun, identified as emission unit No. 3, Constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.
- (d) Solvent clean-up, using hand application method, identified as emission unit No. 4, Operating since 1995, with a maximum solvent capacity of 215 pounds per hour, and

exhausting inside the building.

- (e) One (1) Painting Operation consisting of two (2) Paint Sprayers (HVLPP), identified as emission units Nos. 5 and 6, Constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as PM control, and exhausting to vents identified as Nos. 13 and 14.
- (f) One (1) Varnish/Sealer spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (g) One (1) Adhesive spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (h) One (1) Gelcoat Patch process, using hand application method, Operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building.
- (i) One (1) Putty/Bonding process, using hand application method, Operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building.

#### A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4], Covered in Condition C.5.
- (c) One (1) 31-foot Boat Mold Set
- (d) One (1) 35-foot Boat Mold Set
- (e) One (1) 41-foot Boat Mold Set

#### A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

#### A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.



- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered

timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the

certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms

of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Pursuant to 326 IAC 5-1-1 this rule applies since the source is located in Clark county including Jeffersonville Township.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

## **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is

declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to

noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

##### **C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

##### **C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

##### **C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) 1808/Gelcoat Spray Gun (HVLP), identified as emission unit No. 1, Constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (b) One (1) 0371/FloCoater Gun, identified as emission unit No. 2, Constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.
- (c) One (1) 0637/FloCoater Gun, identified as emission unit No. 3, Constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-4.1] [326 IAC 20-1] [326 IAC 20-25] [40 CFR 63, Subpart VVVV]

The use of resins, gelcoats, and all other solvents used from the gelcoat spray gun and the two (2) flocoater guns (resin/gelcoat process as described in Condition D.1) and also the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent clean-up, putty/bonding process, and gelcoat patch process (all of which are described in Condition D.2), shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of combination HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Compliance with this limit for gelcoats and resins shall be determined based on the following criteria:

- (a) Monthly usage by weight, monomer/HAP content, method of application, and other emission reduction techniques for each gelcoat and resin shall be recorded. Volatile organic HAP emissions from the gelcoat or resin operation shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gelcoat and resin, and summing the emissions for all gelcoats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ. Volatile organic HAP emissions from surface coating, clean-up or non-fiberglass operations shall be calculated by multiplying the usage of each solvent in gallons per hour by the density in pounds per gallon by the HAP content of the solvent.
- (b) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA - approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emissions Factors for Open Molding Composites", July 23 2001, or its updates, and shall not exceed 31.9% styrene emitted per weight of gelcoat applied and 44.9% styrene emitted per weight of resin applied. For the purposes of these emission calculations, monomers in resins and gelcoats that is not styrene shall be considered as styrene on an equivalent weight basis.
- (c) Compliance with these limits in combination with Condition D.2.3 renders 326 IAC 2-4.1, 326 IAC 20-1, 326 IAC 20-25, and 40 CFR 63, Subpart VVVV not applicable.

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

---

- (a) The potential to emit (PTE) Volatile organic compounds (VOC) from the gelcoat spray gun and the two (2) flocoater guns shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits renders 326 IAC 8-1-6 not applicable.
- (b) Compliance with Condition D.1.1 demonstrates compliance with this limit.

**D.1.3 PSD Minor Limit [326 IAC 2-2]**

---

- (a) The potential to emit (PTE) Volatile organic compound (VOC) from the gelcoat spray gun and the two (2) flocoater guns (resin/gelcoat process as described in Condition D.1) and also the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent clean-up, putty/bonding process, and gelcoat patch process (all of which are described in Condition D.2) shall be limited to less than two hundred fifty (250) tons per 12 consecutive month period with compliance determined at the end of each month.
- (b) Compliance with this limit in combination with Condition D.2.2 makes the entire source's VOC PTE less than two hundred fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) is not applicable.

**D.1.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2]**

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Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Gelcoat spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit renders PSD not applicable.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

---

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.6 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)**

---

Compliance with the HAP monomer content limitations in Condition D.1.1 and D.1.2 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet
- (b) The manufacturer's material safety data sheet
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gelcoats. Method 24 may be modified for measuring the volatile HAP content of resins or gelcoats to require that the procedure be performed on uncatalyzed resin or gelcoat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gelcoats by direct injection into a gas chromatograph.
- (d) An alternative method approved by IDEM, OAQ.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.7 Particulate Control**

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The dry filters shall be in operation at all times the gelcoat spray gun is in operation in order to comply with the limit set forth in Condition D.1.4.

#### D.1.8 Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the of the particulate emissions from the stack and the presence of overspray on rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.9 Visible Emissions Notations

---

- (a) Weekly visible emissions notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.10 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
  - (1) The usage by weight and monomer content of each resin and gelcoat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gelcoat;

- (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gelcoat used;
  - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gelcoats are used during that month.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, weekly observations, and those additional inspection prescribed by the Preventive Maintenance Plan.
  - (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of weekly visible emissions notations of the fiberglass operations' stack exhaust.
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Painting Operation consisting of two (2) Paint Sprayers (HVLV), identified as emission units Nos. 5 and 6, Constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as PM control, and exhausting to vents identified as Nos. 13 and 14.
- (b) One (1) Varnish/Sealer spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (c) One (1) Adhesive spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (d) Solvent Clean-up, using hand application, identified as emission unit No. 4, Operating since 1995, with a maximum capacity of 215 pounds per hour, and exhausting inside the building.
- (e) One (1) Putty/Bonding process, using hand application method, Operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building.
- (f) One (1) Gelcoat Patch process, using hand application method, Operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The potential to emit (PTE) Volatile organic compounds (VOC) from the painting operation shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit renders 326 IAC 8-1-6 not applicable.

#### D.2.2 PSD Minor Limit [326 IAC 2-2]

- (a) The potential to emit (PTE) Volatile organic compound (VOC) from the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent clean-up, putty/bonding process, and gelcoat patch process (all of which are described in Condition D.2) and also the gelcoat spray gun, and two (2) flocoater guns (resin/gelcoat process as described in Condition D.1) shall be limited to less than two hundred fifty (250) tons per 12 consecutive month period with compliance determined at the end of each month.
- (b) Compliance with this limit in combination with Condition D.1.3 makes the entire source's VOC PTE less than two hundred fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) is not applicable.

#### D.2.3 Hazardous Air Pollutant (HAP) Limitations [326 IAC 2-4.1] [326 IAC 20-1] [326 IAC 20-25] [40 CFR 63, Subpart VVVV]

The use of resins, gelcoats, and all other solvents, including any clean-up solvents used, shall be limited such that the potential to emit (PTE) of a single HAP shall be less than ten (10) tons per

twelve (12) consecutive month period where compliance is determined at the end of each month and the potential to emit (PTE) of combination HAPs shall be less than twenty-five (25) tons per twelve (12) consecutive month period where compliance is determined at the end of each month. Compliance with this limit when using solvents, excluding resin and gelcoat, including clean-up solvents shall be determined based on Condition D.2.6.

Compliance with these limits in combination with Condition D.1.1 renders 326 IAC 2-4.1, 326 IAC 20-1, 326 IAC 20-25 and 40 CFR 63, Subpart VVVV not applicable.

**D.2.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2]**

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter emissions from the painting operation (identified as emission units Nos. 5 and 6), varnish/sealer spray gun, and the adhesive spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit renders PSD not applicable.

**D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

**Compliance Determination Requirements**

**D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.7 Particulate Control**

The dry filters shall be in operation at all times the painting operation, varnish/sealer spray gun, and adhesive spray gun are in operation in order to comply with the limit set forth in Condition D.2.4.

**D.2.8 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the painting operation, identified as emission units Nos. 5 and 6, exhausting to vents Nos. 13 and 14, the varnish/sealer spray gun exhausting vents Nos. 1-12, and the adhesive spray gun exhausting to vents Nos. 1-12, while one or more of the sprayers and/or spray guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents.
  - (3) The volume weighted VOC content of the coatings used for each month.
  - (4) The clean-up solvent usage for each month.
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### **D.2.10 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Conditions D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) Reporting requirements for Conditions D.2.2 and D.2.3 are covered under Condition D.1.11 (same limitations and reporting requirements as Conditions D.1.1 and D.1.3).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Jefferson Yachts Inc  
Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
FESOP No.: F019-12625-00105

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Jefferson Yachts Inc  
Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
FESOP No.: F019-12625-00105

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
    CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Jefferson Yachts Inc  
Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
FESOP No.: F019-12625-00105  
Facility: One (1) 1808/Gelcoat Spray Gun (HVLP), No. 1  
Parameter: VOC [326 IAC 8-1-6]  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Jefferson Yachts Inc

Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130

Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130

FESOP No.: F019-12625-00105

Facility: One (1) 0371/Flocoater Gun and one (1) 0637/Flocoater Gun, Nos 2 and 3

Parameter: VOC [326 IAC 8-1-6]

Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period each

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Jefferson Yachts Inc

Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130

Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130

FESOP No.: F019-12625-00105

Facility: One (1) Painting Operation consisting of two (2) Paint Sprayers (HVLN), Nos 5 and 6

Parameter: VOC [326 IAC 8-1-6]

Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Jefferson Yachts Inc

Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130

Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130

FESOP No.: F019-12625-00105

Facility: One (1) 1808/Gelcoat Spray Gun (HVLP) (No. 1), One (1) 0371/Flocoater Gun and one (1) 0637/Flocoater Gun (Nos. 2 and 3), Two (2) Paint Sprayers (Nos. 5 and 6), Varnish/Sealer Spray Gun, Adhesive Spray Gun, Solvent Clean-up (No. 4), Putty/Bonding Process, Gelcoat Patch Process

Parameter: VOC [326 IAC 2-2 (PSD)]

Limit: Less than two hundred fifty (250) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Jefferson Yachts Inc

Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130

Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130

FESOP No.: F019-12625-00105

Facility: One (1) 1808/Gelcoat Spray Gun (HVLP) (No. 1), One (1) 0371/Flocoater Gun and one (1) 0637/Flocoater Gun (Nos. 2 and 3), Two (2) Paint Sprayers (Nos. 5 and 6), Varnish/Sealer Spray Gun, Adhesive Spray Gun, Solvent Clean-up (No. 4), Putty/Bonding Process, Gelcoat Patch Process

Parameter: HAP

Limit: Less than ten (10) tons single HAP and less than twenty-five (25) tons combination HAP per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

**Combination of HAP:**

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

**Single emission HAP greater than ten (10) tons per year:** Styrene and Methyl Methacrylate  
(name of HAP)

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Phone: \_\_\_\_\_

Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jefferson Yachts Inc  
Source Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
Mailing Address: 700 E. Market Street, Jeffersonville, Indiana 47130  
FESOP No.: F019-12625-00105

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

Source Name: Jefferson Yachts  
Source Location: 700 E. Market Street, Jeffersonville, Indiana 47130  
County: Clark  
SIC Code: 3732  
FESOP Permit No.: F019-12625-00105  
Permit Reviewer: Amy Cook

On March 5, 2003, the Office of Air Quality (OAQ) had a notice published in the evening news, Jeffersonville, Indiana, stating that Jefferson Yachts had applied for a Federally Enforceable State Operating Permit for a fiberglass boat manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. On March 3, 2003, US EPA published a notice for "Conditional Approval of Implementation Plan: Indiana" in the Federal Register / Vol. 68, No. 41 at pages 9892 through 9895. This notice grants conditional approval to the PSD State Implementation Plan (SIP) under provisions of 40 CFR 51.166 and 40 CFR 52.770 while superceding the delegated PSD SIP authority under 40 CFR 52.793. The effective date for these provisions is April 2, 2003. Therefore, the PSD permits will be issued under the authority of 326 IAC 2-2 and will no longer be issued under the provisions of 40 CFR 52.21 and 40 CFR 124. The following permit conditions have been revised based on the PSD SIP approval status.

#### Condition D.1.3:

##### D.1.3 PSD Minor Limit ~~[326 IAC 2-2] [40 CFR 52.21]~~

- 
- (a) The potential to emit (PTE) Volatile organic compound (VOC) from the gelcoat spray gun and the two (2) flocoater guns (resin/gelcoat process as described in Condition D.1) and also the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent clean-up, putty/bonding process, and gelcoat patch process (all of which are described in Condition D.2) shall be limited to less than two hundred fifty (250) tons per 12 consecutive month period with compliance determined at the end of each month.
  - (b) Compliance with this limit in combination with Condition D.2.2 makes the entire source's VOC PTE less than two hundred fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) ~~and 40 CFR 52.21 are~~ is not applicable.

Condition D.1.4:

D.1.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2] ~~[40 CFR 52.21]~~

---

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Gelcoat spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit demonstrates compliance with PSD.

Condition D.2.2:

D.2.2 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

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- (c) The potential to emit (PTE) Volatile organic compound (VOC) from the painting operation, varnish/sealer spray gun, adhesive spray gun, solvent clean-up, putty/bonding process, and gelcoat patch process (all of which are described in Condition D.2) and also the gelcoat spray gun, and two (2) flocoater guns (resin/gelcoat process as described in Condition D.1) shall be limited to less than two hundred fifty (250) tons per 12 consecutive month period with compliance determined at the end of each month.
- (d) Compliance with this limit in combination with Condition D.1.3 makes the entire source's VOC PTE less than two hundred fifty (250) tons per year. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) ~~and 40 CFR 52.21 are~~ is not applicable.

Condition D.2.4

D.2.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2] ~~[40 CFR 52.21]~~

---

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter emissions from the painting operation (identified as emission units Nos. 5 and 6), varnish/sealer spray gun, and the adhesive spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit demonstrates compliance with PSD.

2. Condition D.1.4 and Condition D.2.4 - language in these conditions has been modified to better clarify intent. These permit conditions have been revised as follows:

Condition D.1.4

D.1.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2]

---

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the Gelcoat spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit ~~demonstrates compliance with PSD~~ **renders PSD not applicable.**

Condition D.2.4

D.2.4 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-2]

---

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter emissions from the painting operation (identified as emission units Nos. 5 and 6), varnish/sealer spray gun, and the adhesive spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limit ~~demonstrates compliance with PSD~~ **renders PSD not applicable.**

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)**

#### **Source Background and Description**

**Source Name:** Jefferson Yachts Inc  
**Source Location:** 700 E. Market Street, Jeffersonville, IN 47130  
**County:** Clark  
**SIC Code:** 3732  
**Operation Permit No.:** F019-12625-00105  
**Permit Reviewer:** Amy Cook

The Office of Air Quality (OAQ) has reviewed a FESOP application from Jefferson Yachts relating to the operation of fiberglass boat manufacturing.

#### **Source Definition**

This fiberglass boat manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 700 E. Market St., Jeffersonville, IN; and
- (b) Plant 2 is located at America Place, Building 252, Jeffersonville, IN.

Since the two (2) plants are located on adjacent properties (separated by one and a half (1.5) miles), have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units and pollution control equipment:

- (a) One (1) 1808/Gelcoat Spray Gun (HVLP), identified as emission unit No. 1, Constructed in June 1995, with a maximum capacity of 402 pounds per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (b) One (1) 0371/FloCoater Gun, identified as emission unit No. 2, Constructed in April 1998, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.
- (c) One (1) 0637/FloCoater Gun, identified as emission unit No. 3, Constructed in April 2000, with a maximum capacity of 402 pounds per hour, and exhausting to vents identified as Nos. 1-12.
- (d) Solvent clean-up, using hand application method, identified as emission unit No. 4, Operating since 1995, with a maximum solvent capacity of 215 pounds per hour, and exhausting inside the building.

- (e) One (1) Painting Operation consisting of two (2) Paint Sprayers (HVLPP), identified as emission units Nos. 5 and 6, Constructed in June 1995, with a maximum capacity of one (1) gallon per hour each (15.32 ounces per minute each), using dry filters as PM control, and exhausting to vents identified as Nos. 13 and 14.
- (f) One (1) Varnish/Sealer spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 32.8 gallons per year, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (g) One (1) Adhesive spray gun, using air atomization, Constructed in June 1995, with a maximum capacity of 3.2 gallons per hour, using dry filters as PM control, and exhausting to vents identified as Nos. 1-12.
- (h) One (1) Gelcoat Patch process, using hand application method, Operating since 1995, used for minor cosmetic repairs and final finishing of small areas of exposed structural composites, and exhausting inside the building.
- (i) One (1) Putty/Bonding process, using hand application method, Operating since 1995, used to accommodate minor variations in product components and structures, and exhausting inside the building.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) One (1) 31-foot Boat Mold Set
- (d) One (1) 35-foot Boat Mold Set
- (e) One (1) 41-foot Boat Mold Set

### Existing Approvals

The source currently does not have any previous approvals.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 application for the purposes of this review was received on August 8, 2000. The Source requested a FESOP on February 15, 2002. Additional Information was received on February 15, 2002, October 3, 2002, and December 11, 2002.

There was no notice of completeness letter mailed to the source for this FESOP.

## Emission Calculations

Calculations are provided in Appendix A of this document (Appendix A, pages 1 through 4).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	295.30
PM-10	295.30
SO <sub>2</sub>	0.00
VOC	601.63
CO	0.00
NO <sub>x</sub>	0.00

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	433.06
Methyl Methacrylate	62.73
All Other HAPS	less than 2
TOTAL	

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the emission data sent in by the company to IDEM, OAQ in October 2002.

Pollutant	Actual Emissions (tons/year)
PM	13.48
PM-10	13.48
SO <sub>2</sub>	0.00
VOC	33.43
CO	0.00
NO <sub>x</sub>	0.00
Styrene	6.42
Methyl Methacrylate	1.24
All Other HAPS	less than 2

## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Worst Case HAPs
Gelcoat Spray Gun	<sup>1</sup>	<sup>1</sup>	--	less than 250 for entire source (PSD)	less than 25 (8-1-6)	--	less than 10 for single HAP  less than 25 for combination HAP
FloCoater Gun (ID #1)	--	--	--		less than 25 (8-1-6)	--	
FloCoater Gun (ID #2)	--	--	--		less than 25 (8-1-6)	--	
Painting Operation	--	--	--		less than 25 (8-1-6)	--	
Clean-up	<sup>1</sup>	<sup>1</sup>	--		--	--	
Gelcoat patch	--	--	--		--	--	
Adhesive spray gun	<sup>1</sup>	<sup>1</sup>	--		--	--	
Putty/Bonding	--	--	--		--	--	
Varnish/Sealer Spray gun	<sup>1</sup>	<sup>1</sup>	--		--	--	
Total Emissions	<sup>1</sup>	<sup>1</sup>	--	less than 250 for entire source	--	--	Less than 10 single, 25 combination

<sup>1</sup> Per 326 IAC 6-3 particulate matter (PM/PM10) shall be limited to 0.03 grains per dry standard cubic foot.

## County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as attainment or unclassifiable for ozone.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. 40 CFR Part 63 Subpart V V V V (Boat Manufacturing) is not applicable because the source is taking a federally enforceable limit of a single HAP of less than ten (10) tons per year and a combination HAP of less than twenty-five (25) tons per year.
- (c) The requirements of section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is taking a federally enforceable limit of a single HAP of less than ten (10) tons per year and a combination HAP of less than twenty-five (25) tons per year.

## State Rule Applicability - Entire Source

### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source has a potential to emit (PTE) greater than two hundred fifty (250) tons per year of VOC, PM and PM10. Actual emissions from the source never exceeded major source thresholds therefore, the source can take limits to avoid PSD. The source is taking a limit of less than two hundred fifty (250) tons per year of VOC. Both PM and PM10 shall be limited to 0.03 grains per dry standard cubic foot pursuant to 326 IAC 6-1-2, and will be controlled by dry filters. Based on the limitation and use of dry filters, the limited potential to emit (PTE) will be less than two hundred fifty (250) tons per year of PM and PM10. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable. The source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

### 326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) This rule does not apply to the Gelcoat spray gun, identified as emission unit No. 1, because it was constructed prior to July 27, 1997.
- (b) This rule does not apply to the two (2) Flocoater guns, identified as emission units Nos. 2 and 3, because the source is taking a federally enforceable limit of a single HAP of less than ten (10) tons per year and a combination HAP of less than twenty-five (25) tons per year.



326 IAC 20-25-1 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This rule does not apply because the source is taking a federally enforceable limit of a single HAP of less than ten (10) tons per year and a combination HAP of less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compound (VOC) and is located in Clark County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Pursuant to 326 IAC 5-1-1 this rule applies since the source is located in Clark county including Jeffersonville Township.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5-1(a) (Fugitive Particulate Matter Emission Limitations)

This rule applies to the nonattainment area of Clark county included in Jeffersonville Township, however the source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, 326 IAC 6-5-1 is not applicable.

**State Rule Applicability - Individual Facilities**

326 IAC 8-2-1 (VOC - Surface Coating Emission Limitations)

This rule does not apply to the source because the boat manufacturing operation is not specifically listed under this rule.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

This rule applies to sources constructed after January 1980 and have the potential to emit (PTE) VOCs greater than twenty-five (25) tons per year.

This rule does not apply because the gelcoat spray gun, two (2) flocoater guns, and painting operation are each taking a federally enforceable limit of less than twenty-five (25) tons per year per facility of VOC.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Since the source is located in Clark County, has PM potential to emit (PTE) of the entire source greater than one hundred (100) tons per year and the actual PM emissions are greater than ten (10) tons per year this rule applies.

- (a) This rule does not apply to the two (2) Flocoater guns, identified as emissions units Nos

2 and 3, because there are no particulate (PM) emissions.

- (b) The particulate (PM) from the Gelcoat spray gun (identified as emission unit No 1), painting operation (identified as emission units Nos. 5 and 6), varnish/sealer spray gun, and the adhesive spray gun shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

The dry filters shall be in operation at all times the gelcoat spray gun, painting operation, varnish/sealer spray gun, and adhesive spray gun are in operation, in order to comply with this limit.

### Testing Requirements

Testing is not required for this source because there is no NSPS/NESHAP applicable and the "major" pollutant does not have a required control device with the potential to emit (PTE) greater than forty percent (40%) of the total plant PTE. The source is also not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. Compliance monitoring requirements applicable to the gelcoat spray gun and two (2) flocoater guns are as follows:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the of the particulate emissions from the stack and the presence of overspray on rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with

Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
  - (d) Weekly visible emissions notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
  - (e) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (f) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
  - (g) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
  - (h) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
2. Compliance monitoring requirements applicable to the painting operation, varnish/sealer spray gun, and adhesive spray gun are as follows.
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the painting operation, identified as emission units Nos. 5 and 6, exhausting to vents Nos. 13 and 14, the varnish/sealer spray gun exhausting vents Nos. 1-12, and the adhesive spray gun exhausting to vents Nos. 1-12, while one or more of the sprayers and/or spray guns are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Conclusion**

The operation of this fiberglass boat manufacturer shall be subject to the conditions of the attached proposed **FESOP No.: F019-12625-00105.**

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 4 TSD App A

**Company Name: Jefferson Yachts Inc  
Address City IN Zip: Jeffersonville, IN 47130  
F: F019-12625-00105  
Reviewer: Amy Cook  
Date: December 19, 2002**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatile s (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Painting	8.91	58.00%	0.0%	58.0%	0.0%	42.00%	5.000	0.330	5.17	5.17	8.53	204.64	37.35	6.76	12.30	75%
Gel Patch	8.99	49.00%	0.0%	49.0%	0.0%	70.00%	9.997	0.042	4.41	4.41	1.84	44.07	8.04	0.00	6.29	100%
Clean up	8.37	98.00%	0.7%	97.3%	0.7%	0.00%	11.165	0.042	8.20	8.14	3.79	91.00	16.61	0.00	ERR	100%
Adhesive	7.04	75.20%	0.0%	75.2%	0.0%	24.80%	1.000	1.000	5.29	5.29	5.29	127.06	23.19	3.82	21.35	50%
Putty/Bonding	7.82	26.60%	0.0%	26.6%	0.0%	97.10%	32.639	0.042	2.08	2.08	2.83	67.95	12.40	0.00	2.14	100%
Varnish/Sealer	7.71	66.00%	0.0%	66.0%	0.0%	34.00%	0.37000	1.000	5.09	5.09	1.88	45.19	8.25	2.12	14.97	50%

**State Potential Emissions                      Add worst case coating to all solvents**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 4 TSD App A

**Company Name: Jefferson Yachts Inc  
Address City IN Zip: Jeffersonville, IN 47130  
F: F019-12625-00105  
Reviewer: Amy Cook  
Date: December 19, 2002**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatile s (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Painting	8.91	58.00%	0.0%	58.0%	0.0%	42.00%	5.000	0.330	5.17	5.17	8.53	204.64	37.35	6.76	12.30	75%
Gel Patch	8.99	49.00%	0.0%	49.0%	0.0%	70.00%	9.997	0.042	4.41	4.41	1.84	44.07	8.04	0.00	6.29	100%
Clean up	8.37	98.00%	0.7%	97.3%	0.7%	0.00%	11.165	0.042	8.20	8.14	3.79	91.00	16.61	0.00	ERR	100%
Adhesive	7.04	75.20%	0.0%	75.2%	0.0%	24.80%	1.000	1.000	5.29	5.29	5.29	127.06	23.19	3.82	21.35	50%
Putty/Bonding	7.82	26.60%	0.0%	26.6%	0.0%	97.10%	32.639	0.042	2.08	2.08	2.83	67.95	12.40	0.00	2.14	100%
Varnish/Sealer	7.71	66.00%	0.0%	66.0%	0.0%	34.00%	0.37000	1.000	5.09	5.09	1.88	45.19	8.25	2.12	14.97	50%

**State Potential Emissions                      Add worst case coating to all solvents**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

Jefferson Yachts Inc  
Jeffersonville, IN 47130  
FESOP : F019-12625-00105  
Reviewer: Amy Cook  
December 19, 2002

### **Calculations for Particulate Matter (PM)**

**Gelcoat Spray Gun (HVLP):** Transfer efficiency 75%; Control 80%; Solids 64.2%  
Capacity 402 lb/hr

PTE:  
 $(402 \text{ lb/hr}) (0.642) (1 - 0.75) = 64.521 \text{ lb/hr} * 4.38 = 282.60 \text{ tons per year of PM}$

Actual:  
 $(402 \text{ lb/hr}) (0.642) (1 - 0.75) (1 - 0.80) = 12.90 \text{ lb/hr}$   
 $12.90 \text{ lb/hr} (2000 \text{ operating hours} / 1 \text{ year}) (1 \text{ ton} / 2000 \text{ lb}) = 12.90 \text{ tons per year of PM}$

### **Flocoater Spray Gun (Resin):**

There is no PM associated with this process because the flocoaters have a 100% transfer efficiency.

### **Other Actual Calculations:** Control 80%; Operating hours 2000

$\text{PTE of PM (operating hours)} / 8760 \text{ (control efficiency)} = \text{Actual PM in tons per year}$

Painting:

$6.76 (2000 \text{ operating hours}) / 8760 (1 - 0.80) = 0.31 \text{ tons per year of PM}$

Adhesive:

$3.82 (2000 \text{ operating hours}) / 8760 (1 - 0.80) = 0.17 \text{ tons per year of PM}$

Varnish/Sealer:

$2.12 (2000 \text{ operating hours}) / 8760 (1 - 0.80) = 0.10 \text{ tons per year of PM}$

Gel Patch; Cleanup; Putting/Bonding:

There is no PM associated with these processes because they are done by hand and have a 100% transfer efficiency

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**Calculations for Volatile Organic Compounds (VOC) - Actuals**

PTE of VOC (operating hours) / 8760 = Actual VOC in tons per year

Painting:

$37.35 \text{ (2000 operating hours)} / 8760 = 8.53 \text{ tons per year of VOC}$

Adhesive:

$23.19 \text{ (2000 operating hours)} / 8760 = 5.29 \text{ tons per year of VOC}$

Varnish/Sealer:

$8.25 \text{ (2000 operating hours)} / 8760 = 1.88 \text{ tons per year of VOC}$

Gel Patch:

$8.04 \text{ (2000 operating hours)} / 8760 = 1.84 \text{ tons per year of VOC}$

Cleanup:

$16.61 \text{ (2000 operating hours)} / 8760 = 3.79 \text{ tons per year of VOC}$

Putting/Bonding:

$12.40 \text{ (2000 operating hours)} / 8760 = 2.83 \text{ tons per year of VOC}$



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## Calculations for Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

### Styrene:

Tons of Resin or Gel from unified emission factor sheet (% Styrene) (2000) = Emission Factor

[Gelcoat = 34.9 lb/hr actual maximum capacity; 31% Styrene]

[Flocoater = 29.8 lb/hr actual maximum capacity each; 44.9% Styrene each]

[Gelcoat and Flocoat = 402 lb/hr potential maximum capacity each]

Gelcoat:  $0.445 (0.31) (2000) = 275.90$  emission factor

PTE:  $402 \text{ lb/hr} / 2000 (275.90) (4.38) = 242.90$  tons per year

Actual:  $34.9 \text{ lb/hr} / 2000 (275.90) (2000 \text{ op. hour/yr}) (\text{tons}/2000 \text{ lb}) = 4.81$  tons per year

Flocoat (2): emission factor = 108 [from unified emission factor sheet]

PTE:  $402 \text{ lb/hr} / 2000 (108) (4.38) = 95.08 (2) = 190.16$  tons per year

Actual:  $29.8 \text{ lb/hr} / 2000 (108) (2000 \text{ op. hour/yr}) (\text{tons}/2000 \text{ lb}) = 1.61 (2) =$   
3.22 tons per year

### Methyl Methacrylate:

% MM in gel (emission factor) / MM % content = emission factor

[%MM in gel = 4.75, number supplied by company]

[MM % content = 4, 60, number from unified emission factor sheet]

Gelcoat:  $4.75 (60) / 4 = 71.25$  emission factor

PTE:  $402 \text{ lb/hr} / 2000 (71.25) (4.38) = 62.73$  tons per year

Actual:  $34.9 \text{ lb/hr} / 2000 (71.25) (2000 \text{ op hours/yr}) (\text{tons}/2000 \text{ lb}) = 1.24$  tons per year